

REMARKS/ARGUMENTS

Applicant thanks Examiner for the detailed Office Action dated February 7, 2007. In response to the issues raised, the Applicant offers the following submissions.

35 USC §102 Claims 11-13 and 16

Claims 11-13 and 16 stand rejected for lack of novelty in light of US 5,719,604 to Inui et al.

The Applicant respectfully submits that the Inui reference does not disclose all the elements of independent claim 11. Claim 11 is restricted to printhead chips with "a CMOS drive circuitry layer positioned on the wafer substrate". The Examiner argues that the layer 6 of heater material equates to the CMOS drive circuitry defined in claim 11. The Applicant respectfully disagrees. The heater layer 6 is a part of the buckling body 2 which the Examiner has equated with the thermal bend actuator of the present invention. If heater layer 6 is part of the thermal bend actuator 2, then it can not be spaced from the thermal bend actuator 2 as required by claim 11.

Inui describes the heater layer having exposed portions that are electrical contacts for connection to 'outside' circuitry (see column 5, lines 1-4). Accordingly, there is no disclosure of CMOS drive circuitry on the wafer substrate and there is no disclosure of the spacing between the buckling body 2 and the circuitry that does drive the Inui printhead.

In light of the above, the citation does not disclose the combination of elements defined in independent claim 11. Hence it also fails to disclose all the elements of dependent claims 12-16 as well. It follows that the cited reference does not support a §102 rejection.

Conclusion

It is respectfully submitted that the Examiner's rejection has been successfully traversed and the application is now in condition for allowance. Accordingly, favorable reconsideration is courteously solicited.

Very respectfully,

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